

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

JANE DOE,

Plaintiff,

CIVIL ACTION FILE NO.:

v.

1:20-CV-02817-ELR

MOREHOUSE SCHOOL OF
MEDICINE, DR. VALERIE
MONTGOMERY RICE, DR. NGOZI
ANACHEBE, MARLA THOMPSON,
AND JOHN DOES 1-25.

Defendants.

JOINT MOTION TO STAY PROCEEDINGS

Come now Plaintiff Jane Doe (“Plaintiff”) and Defendants Morehouse School of Medicine, Dr. Valerie Montgomery Rice, Dr. Ngozi Anachebe, and Marla Thompson (hereinafter “Defendants”), by and through counsel of record, and file this Joint Motion to Stay Proceedings. In support of this Motion, the Parties state as follows:

1. Plaintiff filed the Complaint on July 6, 2020. (Doc. No. 1.)
2. Defendants response to the Complaint is due on or before December 18, 2020. (Doc. No. 19.)
3. The Parties are actively working to resolve the claims in this litigation and desire more time to work through a potential settlement of the allegations in this case prior to Defendants filing a response and the parties engaging in

discovery. The Parties are also actively discussing the potential dismissal of the individual defendants.

4. Therefore, the parties seek a brief stay of all proceedings in this action for a period of 90 days, up to and through March 17, 2021. If the Parties are successful at reaching a settlement agreement, they will promptly notify the Court accordingly. If the Parties' good faith efforts to settle the claims in this case are unsuccessful, Defendants request fourteen (14) days after the stay ends to file their response to the Complaint.

5. This Motion is not made for the purpose of delay but so that justice may be served and so that the Parties may attempt, in good faith, to resolve the issues in this case. Given the nature of this Motion, the parties request that they are relieved of the requirement of filing a supporting memorandum. A Proposed Order has been filed concurrently with this Motion.

Respectfully submitted this 17th day of December, 2020.

By:

/s/ Tanisha Pinkins
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Attorneys for Plaintiff Jane Doe

CERTIFICATION OF FONT

I hereby certify that the foregoing document has been prepared in 14-point Times New Roman font and complies with Local Rule 5.1(C) and 7.1(D), NDGA.

This 17th day of December, 2020.

/s/ Tanisha Pinkins
TANISHA PINKINS

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing *Joint Motion to Stay All Proceedings* with the Clerk of the Court using the ECF system, which sent notification of such filing to counsel of record.

This 17th day of December, 2020.

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.

/s/ Tanisha Pinkins
TANISHA PINKINS
GA Bar No. 686450

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